

**THIS EMAIL IS BEING SENT TO PUBLIC SCHOOL  
SUPERINTENDENTS, ESU ADMINISTRATORS, AND THE NDE  
TITLE I LISTSERV. PLEASE FORWARD AS APPROPRIATE.**

September 1, 2015

Greetings from the NDE Title I Office,

With the 2015-16 school year under way, here are a few reminders regarding Title I. This is not a complete list, but merely a reminder of some things that are occasionally overlooked.

**1. Time and Effort Logs**

Federal funds may only be used for employee compensation if appropriate “time-and-effort” records are maintained. Time-and-effort reporting is important in ensuring that Federal program funds are used to pay only their proportionate share of personnel costs.

2 CFR 200.430(i)(1) states “Charges to Federal awards for salaries and wages must be based on records that accurately reflect the work performed. These records must: (vii) Support the distribution of the employee’s salary or wages among specific activities or cost objectives if the employee works on more than one Federal award; a Federal award and non-Federal award; an indirect cost activity and a direct cost activity; two or more indirect activities which are allocated using different allocation bases; or an unallowable activity and a direct or indirect cost activity.”

NDE recommends that subrecipients continue using the prior time and effort guidance from OMB circular A-87 to ensure adequate support of the distribution of their employee’s salary and wages.

- a. Any personnel paid from Federal Funds must maintain a Time and Effort Log; sometimes called Personnel Activity Records (PARs). A Time and Effort Log is an after-the-fact report of actual activity of an employee. Logs must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person’s schedule such as building principal, HR representative, or superintendent. These logs must be kept on file and will be reviewed during ESEA/NCLB monitoring. Local auditors may also request to see the logs. **NOTE: (1) Time and Effort logs are required for every staff member being paid with *any* source of Federal funds. (2) Substitute teachers being paid with Federal funds, must have a signed PAR. (3) Staff being paid stipends with Federal funds must have a signed PAR.**
  - i. Monthly verifications are required if paid from multiple cost objectives and the schedule fluctuates.
    - 1. An employee is considered to work on multiple cost objectives if s/he works on:
      - a. More than one Federal award;
      - b. A Federal award and a non-Federal award;
      - c. An indirect cost activity and a direct cost activity;

- d. Two or more indirect cost activities which are allocated using different allocation bases; or
- e. An unallowable activity and a direct or indirect cost activity
- ii. Semiannual verifications are required if being paid from only one source or working on a single cost objective.

**b. Nebraska's Substitute/Alternate Time and Effort Reporting System**

- i. If an employee has **a set schedule, even if working on multiple cost objectives**, s/he may complete semiannual verifications. Verifications (schedule) must be signed by the employee **and** their supervisor or another person in a supervisory position who is familiar with the person's schedule, and kept on file.
- ii. Additional information regarding Time and Effort Logs can be found in the *NDE State and Federal Grants Management Guidance*, which can be found at <http://www.education.ne.gov/federalprograms/Index.html> in the right-hand column beneath the header "Grants Management (GMS) and Finance).

**2. Parent Notification**

- a. Parents of students attending any school in a District receiving Title I funds may request, and the district will provide to the parents in a timely manner, information regarding the professional qualifications of the student's teacher(s). The notification that parents can request this information must be shared annually. This may be done in the schools' handbooks, newsletters, etc.

**3. Parent Compacts**

- a. Compacts meeting the ESEA/NCLB requirements are to be provided to Title I students and their parents at least annually. In a Schoolwide Program, this would include ALL students.
  - i. Compacts are to be reviewed annually and updated as needed.
  - ii. It is okay for Schoolwide Programs to include the compact in the Parent Handbook.
  - iii. Signatures by parents and participating students are optional, but strongly encouraged.

**4. Title I Parent Involvement Policies**

- a. Title I Parent Involvement Policies that meet ESEA/NCLB requirements must be reviewed annually and updated as needed. These policies are to be shared with parents of participating students—this means ALL students in a Schoolwide Program. Parent Involvement Policies are required for the district AND each Title I building. Though it is called a policy, Board approval is not required. (See ESEA/NCLB Monitoring Guide Checklist for Parent Policy requirements.)

**5. Highly Qualified Staff (Teachers and Paras)**

- a. Building principals must annually certify in writing that all teachers in the building are highly qualified. This information is to be kept on file in the building, but does not need to be submitted to the NDE Title I Office. Attestations will be reviewed during ESEA/NCLB monitoring. A sample attestation form is available at this [link](#). By no means is the use of this form required. It is only required that buildings have a signed statement on file.
- b. **PRIOR TO WORKING WITH STUDENTS, Title I Instructional paraprofessionals must meet ESEA/NCLB requirements.** Paraprofessional requirements and other para information can be found at [para](#).
  - i. In TAS buildings this includes any para funded by Title I.
  - ii. In a SW program, this includes **ALL** instructional paras.

7. **Schoolwide Eligibility**

- a. Schools having a poverty level of 40% or above are eligible to become Title I Schoolwide Programs.
- b. Schools that are eligible for, but don't already have a Schoolwide Program, may submit a "Title I Schoolwide Intent Form," by November 1<sup>st</sup> and use the 2015-16 school year to develop a schoolwide plan. If you have questions regarding Schoolwide Programs, contact Beth Zillig ([beth.zillig@nebraska.gov](mailto:beth.zillig@nebraska.gov) or 402-471-2452).
- c. Information regarding Title I Schoolwide Programs is available on the NDE Title I webpage: <http://www.education.ne.gov/federalprograms/Title%20I%20Part%20A.html>

8. **Non-Regulatory Guidance for Title I Fiscal Issues (February 2008)** can be found at the following link: <http://www.ed.gov/programs/titleiparta/fiscalguid.doc>. This document contains information on the following topics:

- a. Maintenance of Effort
- b. Comparability
- c. Supplement, Not Supplant
- d. Carryover
- e. Consolidating Funds in Schoolwide Programs
- f. Grantback Requirements

**NOTE: Much of the information described in number 7, is also included in the NDE State and Federal Grants Management Guidance," which is available at the following url:** <http://www.education.ne.gov/federalprograms/Index.html>,

beneath the header "Grants Management (GMS) and Finance.

9. Please contact the NDE Title I Office if your district or school is intending to use Title I funds for either **Rtl** (Response to Intervention) or **preschool** as there are specific guidelines to be followed.

10. **Transact**

- a. The Nebraska Department of Education has paid the license fee for all Nebraska School Districts for the 2015-16 school year to access the Transact website: <http://www.transact.com/>. The website contains numerous forms that are available in multiple languages. Forms include everything from required parent notifications, bullying incident report forms, emergency information cards, head lice information, status of school AYP, school choice information, field trip permissions, to forms that have been specifically designed for Nebraska regarding IDEA and ELL (i.e. Home Language surveys). (Any document with "NE" as part of the title is specific to Nebraska.)
  - i. If you haven't checked out this website, I strongly encourage you to do so. Anyone from a district can access the Transact website and districts may have multiple users. First time users will need to register for access.

11. **NDE Title I Listserv**

- a. Occasionally, throughout the school year, information regarding Title I is sent to the Title I listserv.
  - i. We are in the process of updating the Title I listserv email addresses. If you no longer wish to receive email messages from the NDE Title I Office, please let us know and your email address will be removed.
  - ii. If someone else in your district or school would like to be added to the Title I listserv, please have them send an email to [diane.stuehmer@nebraska.gov](mailto:diane.stuehmer@nebraska.gov) or [beth.zillig@nebraska.gov](mailto:beth.zillig@nebraska.gov) that includes their first and last name, school district, and position.

## 12. Requests for Reimbursement

- a. Districts are encouraged to submit requests for reimbursement throughout the school year. The timeline may not be the same for every district. Some may choose to submit quarterly, while others may opt to submit monthly requests. It is advisable to submit requests for reimbursement more than once a year. Districts/ESUs have the option of submitting separate requests for salaries/benefits, and other expenditures. Providing appropriate documentation will speed up the review process. The following expenditures **always** require supporting documentation.
  - i. Credit card purchases
  - ii. Travel expenditures
  - iii. Petty cash purchases
  - iv. Reimbursement to individuals
  - v. Allowable field trips must include the educational value
  - vi. Generally, there is a very high burden of proof that paying for food and beverages with Federal funds is necessary to meet the goals and objectives of a Federal grant. There may be unique circumstances where the costs would be permissible because they are reasonable and necessary. To be considered for reimbursement, the district must provide a detailed explanation as to why the purchase is necessary with Federal funds
- b. Information regarding allowable Federal Title Program Expenses is available by clicking [here](#).

The chart below provides a list of ESEA/NCLB Reviewer and Title I Consultant Assignments, by ESU area, for the 2015-16 school year. The ESEA/NCLB Reviewer is the person responsible for reviewing the ESEA/NCLB Consolidated Application and onsite monitoring. The Title I Consultant is the person who can respond to Title I specific questions. You will note there are a couple of new names on the list. Karen Hardin started with the Federal Programs Team in July and Brooke David joined us in August. We are excited to have them as part of the Federal Programs Team at NDE.

--2015-16 ESEA/NCLB and TITLE I REVIEWER ASSIGNMENTS --		
ESU	NCLB REVIEWER	TITLE I CONSULTANT
1	Randy McIntyre	Randy McIntyre
2	Pat Frost	Pat Frost
3	Beth Zillig & Brad Conner	Beth Zillig & Brad Conner
4	Brooke David	Randy McIntyre
5	Pat Frost	Pat Frost
6	Terri Schuster	Karen Hardin
7	Pat Frost	Pat Frost
8	Karen Hardin	Karen Hardin
9	Cathy Mohnike	Cathy Mohnike
10	Cathy Mohnike	Cathy Mohnike
11	Jan Handa	Pat Frost
13	Brad Conner	Brad Conner
15	Karen Hardin	Karen Hardin
16	Cathy Mohnike	Cathy Mohnike
17	Brad Conner	Randy McIntyre
18	Randy McIntyre	Randy McIntyre
19	Beth Zillig	Beth Zillig

The ESEA/NCLB 3-Year Monitoring Schedule can be found [here](#).

An updated list of Title I Schoolwide Programs is available at [SWP](#).

**Presentations**

Administrators' Days Presentations from 2015 and 2014 and the July 29, 2014 Federal Programs Conference are available on the following webpage:

<http://www.education.ne.gov/federalprograms/Index.html>

Please don't hesitate to contact the NDE Title I staff whenever you have questions related to Title I.

**Have a GREAT school year!**